

1 J Christopher Jorgensen
Nevada Bar No. 5382
2 Lewis Roca Rothgerber Christie LLP
3993 Howard Hughes Pkwy, Suite 600
3 Las Vegas, NV 89169
Tel: 702.949.8200
4 E-mail: cjorgensen@lrrc.com

5 *Attorneys for Defendant*
Barclays Bank Delaware

6
7 **UNITED STATE DISTRICT COURT**
DISTRICT OF NEVADA

8 PEGGY A. ROLDAN,
9 Plaintiff,

10 vs.

11 TRANSUNION, LLC; BARCLAYS BANK,
12 DELAWARE,
13 Defendants.

Case No.: 2:19-cv-01302-JCM-EJY

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEFENDANT
BARCLAYS BANK DELAWARE'S
TIME TO RESPOND TO COMPLAINT**
(FIRST REQUEST)

14 This Stipulation to Extend Time to Respond to Complaint is made by and between
15 Plaintiff Peggy A. Roldan ("Plaintiff") and Defendant Barclays Bank Delaware ("Barclays")
16 through their respective counsel, in light of the following facts:

17 **RECITALS**

18 A. Plaintiff filed the Complaint ("Complaint") against Barclays on or about July
19 29, 2019.

20 B. Barclays was served with the Complaint on August 6, 2019.

21 C. Barclays' current deadline to respond is August 27, 2019.

22 D. The parties agreed to extend Barclays' time to respond to the Complaint through
23 September 26, 2019, in order to give Barclays time to investigate Plaintiff's claims and prepare
24 a proper response, and for the parties to discuss a potential resolution of this matter.

25 E. There is good cause to grant this stipulation because Barclays requires additional
26 time to investigate Plaintiff's claims and prepare a proper response, and the parties require
27 additional time to consider a resolution of this matter.

28 F. Pursuant to Local Rule IA 6-2 and Local Rule 7.1, Plaintiff and Barclays

1 respectfully request that the Court extend Barclays' time to respond to Plaintiff's Complaint
2 through September 26, 2019.

3 **STIPULATION**

4 NOW, THEREFORE, Plaintiff and Barclays hereby stipulate and agree that Barclays
5 has up to and including September 26, 2019, to file a response to Plaintiff's Complaint.

6 **IT IS SO STIPULATED**

7 DATED: August 27, 2019

LEWIS ROCA
ROTHGERBER CHRISTIE LLP

9 By: /s/ J Christopher Jorgenson
10 J Christopher Jorgensen
11 Attorneys for Defendant
Barclays Bank Delaware

12 DATED: August 27, 2019

HAINES & KRIEGER, LLC

14 By: /s/ David H. Krieger
15 David H. Krieger
16 Attorney for Plaintiff
Michelle H. Pro

17 **ORDER**

18 **IT IS SO ORDERED**

19 
20 United States Magistrate Judge

21 DATED August 27, 2019